

**RESPONSE TO UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY'S
REQUEST FOR INFORMATION UNDER SECTION 104(E) OF
THE COMPREHENSIVE ENVIRONMENTAL RESPONSE,
COMPENSATION AND LIABILITY ACT**

**HILCO REDEVELOPMENT, LLC
HRE CRAWFORD, LLC
HILCO GLOBAL**

NOVEMBER 20, 2020

Certification

As required pursuant to Instruction 6 of the United States Environmental Protection Agency's Information Request, this Response is submitted under the following certification and under authorized signature:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete.



By: Anne Garr

Title: General Counsel of Hilco Redevelopment, LLC and

Authorized Signatory for HRE Crawford, LLC and

Hilco Global

Date: November 20, 2020

General Objections

Respondent asserts the following General Objections to the United States Environmental Protection Agency's ("EPA") Information Request ("Request"), and hereby incorporates each of the General Objections in each and every response to the individual requests. To the extent that Respondent responds to a specific part of the Request, it does not waive any objections through its providing information.

1. Respondent objects to the Request to the extent the Request exceeds the scope of EPA's authority under the statutory references cited in the Request.
2. Respondent objects to the Request as overly broad and unduly burdensome to the extent it imposes any burden on Respondent not imposed by applicable law including the discovery provisions of the Federal Rules of Civil Procedure and the Consolidated Rules of Administrative Practice at 40 CFR Part 22.
3. Respondent objects to the Request on the grounds that it is vague, ambiguous, overbroad, unduly burdensome, and seeks information that is neither relevant nor material or that is redundant. Nonetheless, Respondent has made a good faith effort to define the scope of the Request despite the Request's ambiguity and to provide EPA with the information it requests.
4. Respondent objects to the Request to the extent it seeks information protected from disclosure by the attorney-client privilege, the attorney-work product doctrine, the joint defense privilege, and any other legally cognizable privilege. Any inadvertent production of the same shall not be deemed a waiver of any such privilege or doctrine, nor shall any intentional production of a document subject to such privilege or doctrine waive such privilege or doctrine for other related documents.
5. Respondent objects to the Request to the extent that it asks the Respondent to make legal conclusions. For example, if EPA is asking Respondent to determine whether a "release" occurred, it asks Respondent to make a legal conclusion, and Respondent objects to such request.
6. Respondent objects to the Request to the extent that it (i) seeks information outside of the Respondent's possession, custody, or control, (ii) asks Respondent to respond based on information possessed or controlled by third parties including any agents or contractors Respondent engaged to perform work at the Facility, or any subcontractors engaged by Respondent's contractors; and (iii) seeks to impose on Respondent any obligation to obtain, develop or create new records or information not already existing.
7. Respondent objects to the Request to the extent it seeks confidential and/or personal information regarding third parties, such as current or former employees.
8. Respondent has made a diligent, thorough, and good faith effort to interview employees, review its paper and electronic files, and obtain documents and information responsive to the

Request. However, certain responses to the Request are based on the best information available, and Respondent reserves its right to supplement this Request.

9. Respondent has made a diligent, thorough, and good faith effort to review its paper and electronic files, and to provide documentation in the requested searchable PDF format. However, in some instances, Respondent has provided PDF-format documentation that may not be searchable, which documentation represents the best available versions of such documentation Respondent could obtain.

Additionally, Respondent submits its response without waiving, and intending to preserve all of:

- a) its objections to the competency, relevancy, materiality, authenticity, and admissibility of any information or documents produced, or to the subject matter thereof;
- b) its rights to object on any ground to the use of any information or documents disclosed, or the subject matter thereof, in any subsequent proceedings, including any civil or administrative trial based upon the information submitted in this response or any other action;
- c) its constitutional rights including without limitation the right to due process;
- d) its rights to object on any grounds to these information or discovery requests;
- e) its rights to amend any responses and objections herein; and
- f) any other rights and objections available at law.

10. Respondent objects to the Request to the extent it attempts to impose any continuing duty to supplement these responses on the basis that such duty is unreasonable and beyond EPA's authority under 42 U.S.C. §§ 9601-9675. Notwithstanding this objection, Respondent reserves the right to supplement, modify, and/or amend this Response if new or additional information is discovered.

Response Overview

This Response includes and references information that constitutes **Business Confidential Information** within the meaning of this or similar terms under 40 C.F.R. § 2.203(b). Respondent indicates throughout the body of its Response where Business Confidential Information is present, specifically at responses 6, 10, 16, 17, 24, 29, and 30, and identifies each supporting document provided in Attachment A that qualifies as Business Confidential Information, and has also labeled each page of every such document constituting Business Confidential Information with the words, “Business Confidential.” Respondent has also redacted certain proprietary information from its Business Confidential documents that is both irrelevant and non-responsive to the questions posed in EPA’s Request.

Respondent is submitting this Response on behalf of the following entities identified in the EPA’s Request regarding the former Crawford Plant at 3501 S. Pulaski Road, Chicago, IL (“Facility” or “Crawford Facility”): Hilco Redevelopment, LLC, HRE Crawford LLC, and Hilco Global (“Hilco Entities”) and their officers, managers, employees, contractors, trustees, and any applicable subsidiaries or parent corporations which own the Facility or are responsible for its operation. As explained more fully in individual responses, the current owner of the Facility is HRP Exchange 55, LLC (“HRP Exchange”), which entity obtained ownership from HRE Crawford, LLC. While HRE Crawford, LLC has not been legally dissolved, it no longer has any ownership interest in, or control over, the Facility. [REDACTED]

[REDACTED] The Respondent identifies the information in the preceding sentence as **Business Confidential Information** pursuant to 40 CFR § 2.203(b).

Information Request Response

1. Identify all persons consulted in the preparation of the answers to this request.

ANSWER: Subject to and without waiving the General Objections, Respondent states that the following individuals, in addition to legal counsel, provided information to answer the Request for Information on behalf of Respondent:

- A. Anne Garr, General Counsel, Hilco Redevelopment, LLC
- B. Nicholas Pullara, Vice President of Development, Hilco Redevelopment, LLC
- C. Jeremy Grey, Executive Vice President, Industrial Development, Hilco Redevelopment, LLC
- D. Roberto Perez, Chief Executive Officer, Hilco Redevelopment, LLC
- E. John Tschantz, Vice President of Acquisitions, Hilco Redevelopment, LLC
- F. Michael Bauer, Vice President of Finance, Hilco Redevelopment, LLC
- G. Eric Kaup, Executive Vice President – General Counsel, Hilco Trading, LLC
- H. Ryan Hartley, Senior Project Manager, V3 Companies
- I. David Kedrowski, Principal, Weaver Consultants Group
- J. Mike Maxwell, Chicago Operations Manager, Weaver Consultants Group
- K. Peter Cambouris, Principal, Weaver Consultants Group
- L. Pablo Sanchez-Soria, Project Toxicologist, Center for Toxicology and Environmental Health

Contributing Sources: Above listed individuals.

2. Identify all documentation consulted, examined, or referred to in the preparation of the answers to this request and provide copies of all such documents.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects that this request is overbroad, unduly burdensome, and the scope of materials sought is not relevant for the scope of information EPA is authorized to pursue as provided in 42 U.S.C. § 9604(e)(2). Subject to and without waiving its objections, Respondent directs EPA to Attachment A, which includes an index of such requested documentation.

Contributing Sources: Attachment A and individuals listed in the response to Request 1.

3. What are the Standard Industrial Classification Codes for HRE Crawford LLC, Hilco Redevelopment, and Hilco Global?

ANSWER: Respondent incorporates here by reference its General Objections. Subject to and without waiving its objections, Respondent identifies 6519 as the Standard Industrial Classification Code for each of HRE Crawford, LLC and Hilco Redevelopment, LLC. “Hilco Global” is a trade name registered in the State of Delaware and it is used for marketing purposes by Hilco Trading. As a marketing name, “Hilco Global” does not utilize a SIC code. Respondent identifies 6719 as the Standard Industrial Classification Code for Hilco Trading.

Contributing Sources: Michael Bauer; Anne Garr; Eric Kaup; Hilco Global DBA Registration, identified in Attachment A.

4. What are the North American Industrial Classification System Codes for HRE Crawford LLC, Hilco Redevelopment, and Hilco Global?

ANSWER: Respondent incorporates here by reference its General Objections. Subject to and without waiving its objections, Respondent identifies 531390 as the North American Industrial Classification System Code for each of HRE Crawford, LLC and Hilco Redevelopment, LLC. “Hilco Global” is a trade name registered in the State of Delaware and is used for marketing purposes by Hilco Trading. As a marketing name, “Hilco Global” is not associated with a NAICS code. Respondent identifies 523900 as the North American Industrial Classification System Code for Hilco Trading.

Contributing Sources: Michael Bauer; Anne Garr; Eric Kaup; Hilco Global DBA Registration, identified in Attachment A.

5. What is the Dun & Bradstreet number for HRE Crawford LLC, Hilco Redevelopment, and Hilco Global?

ANSWER: Respondent incorporates here by reference its General Objections. Subject to and without waiving its objections, Respondent identifies 11-713-0387 as the Dun & Bradstreet number for Hilco Redevelopment, LLC. HRE Crawford, LLC does not identify with a Dun & Bradstreet number. “Hilco Global” is a trade name registered in the State of Delaware and is used for marketing purposes by Hilco Trading. As a marketing name, “Hilco Global” is not associated with a Dun & Bradstreet number. The Dun & Bradstreet number for Hilco Trading is 83-157-2040.

Contributing Sources: Michael Bauer; Anne Garr; Eric Kaup; Hilco Global DBA Registration, identified in Attachment A.

6. What are HRE Crawford LLC, Hilco Redevelopment, and Hilco Global’s annual sales for the most recently completed fiscal year?

ANSWER: Respondent incorporates here by reference its General Objections. Respondent also specifically objects to the question as vague and ambiguous,

particularly with respect to the term “sales.” Respondent also specifically identifies the information provided in response to this Request 6 as **Business Confidential Information** pursuant to 40 CFR § 2.203(b). Subject to and without waiving its objections, Respondent indicates that it is not in the business of selling goods, products or other personal property, and therefore has no sales of goods for the most recently completed fiscal year. [REDACTED]

Contributing Sources: Michael Bauer; Eric Kaup.

7. How many employees are employed at HRE Crawford LLC, Hilco Redevelopment, and Hilco Global?

ANSWER: Respondent incorporates here by reference its General Objections. Subject to and without waiving Respondent’s objections, Respondent states that HRE Crawford, LLC has no employees. Hilco Redevelopment, LLC has approximately 49 employees. “Hilco Global” is a trade name registered in the State of Delaware and is used for marketing purposes by Hilco Trading. As a marketing name, “Hilco Global” does not have any employees. Hilco Trading has approximately 42 employees.

Contributing Sources: Michael Bauer; Anne Garr.

8. How many employees are employed at HRE Crawford LLC, Hilco Redevelopment, and Hilco Global corporate wide?

ANSWER: Respondent incorporates here by reference its General Objections. Subject to and without waiving Respondent’s objections, Respondent directs EPA to its prior response to Request 7.

Contributing Sources: Michael Bauer; Anne Garr.

9. Is former Crawford facility located at 3501 South Pulaski Road, Chicago, IL, 60623 (“former Crawford facility” or “the facility”) a RCRA facility? If so, provide the EPA Identification Number.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects to the question as vague and ambiguous with respect to the term “RCRA facility.” Subject to and without waiving Respondent’s objections, Respondent refers EPA to its response to Request 14, which provides information regarding the ownership history of the Facility. Respondent further states that at all times during ownership by HRE Crawford, and currently HRP Exchange, the Facility has not operated as a power generation facility. Respondent refers EPA to the NRG Documents, identified in Attachment A, for historical environmental documents provided to Respondent by the seller of the Facility at the time of initial

acquisition by HRE Crawford. Respondent's activities at the Facility have included demolition, remedial work as part of Respondent's voluntary enrollment in the Illinois Site Remediation Program ("SRP") in furtherance of a comprehensive no further remediation ("NFR") letter from the Illinois EPA, and redevelopment of the Facility for future reuse as a modern, state of the art logistics facility. In the course of performing these activities, Respondent has not possessed, nor is it required to so possess, a permit under RCRA. Further, while Respondent has properly handled, transported, recycled and disposed of various waste materials, to the best of Respondent's knowledge, it has not stored, handled, transported, recycled or disposed of any hazardous wastes generated during the course of its activities at the Facility. Respondent refers EPA to the Illinois SRP Documents and Waste Manifests, each as identified in Attachment A.

Contributing Sources: Nicholas Pullara; Ryan Hartley; NRG Documents; Waste Manifests; Illinois SRP Documents.

10. Provide a copy of your emergency plan which outlines the procedures for notification of accidental releases at the facility for the time of the release.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects to this request as vague and ambiguous, as the terms "emergency plan," "notification," "accidental release," and "time of the release" are not clearly defined. Respondent also specifically objects to any inference, implication or conclusion that any "release" occurred at the Facility. Respondent also objects to the Request to the extent it calls for a legal conclusion or otherwise implies that Respondent is subject to any applicable legal requirement which requires Respondent to have an emergency plan. Respondent identifies the following response, as well as documents provided in support of this response, as containing **Business Confidential Information** pursuant to 40 CFR § 2.203(b).

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11. Provide the Controlled Demolition Incorporated (CDI) Preliminary Plan & Procedure for the demolition at the facility on April 11, 2020.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent also objects to the request to the extent it implies that a Preliminary Plan & Procedure was required by law. Respondent further objects to the request to the extent that it seeks information that is not in Respondent's possession, custody, or control. Subject to and without waiving Respondent's objections, Respondent refers EPA to the Preliminary Plan & Procedure, identified in Attachment A.

Contributing Sources: CDI's Preliminary Plan & Procedure for the demolition of Unit #8 – 378' Chimney.

12. Provide the Controlled Demolition Incorporated (CDI) Standard Written Report for the demolition at the facility on April 11, 2020.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent also objects to the request to the extent it implies a Standard Written Report was required by law. Respondent further objects to the request to the extent that it seeks information that is not in Respondent's possession, custody, or control.

Subject to and without waiving Respondent's objections, Respondent indicates that it has not located or identified a copy of the requested document.

Contributing Sources: Nicholas Pullara; Jeremy Grey.

13. Provide documentation regarding the training of your employees on the procedures for notification of accidental releases at the facility at the time of the release.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects to any inference, implication or conclusion that any "release" has occurred at the Facility. Respondent also objects to the request as vague and ambiguous in that it does not provide any temporal frame of reference. Respondent further objects to the request to the extent that it seeks information that is not in Respondent's possession, custody, or control. Subject to and without waiving Respondent's objections, Respondent refers EPA to its prior response to Requests 7 and 10. Respondent further states that HRP Exchange's demolition contractors are required by contract to conduct all work pursuant to State, Federal, and local laws, rules and regulations and are responsible for training their personnel and subcontractors to the extent required by law. Respondent has not identified or located any documents responsive to this request.

Contributing Sources: Nicholas Pullara; Anne Garr; Demolition Agreement.

14. Provide the name and current address of the owner(s) of the property located at 3501 South Pulaski, Chicago, Illinois, during the time period of January 1, 2019, to the present.

ANSWER: Respondent incorporates here by reference its General Objections. Subject to and without waiving its objections, Respondent responds as follows:

- The owner of the property located at 3501 South Pulaski, Chicago, Illinois during the time period of January 1, 2019 to July 10, 2019 was HRE Crawford, LLC. The address of HRE Crawford, LLC is 5 Revere Drive, Suite 206, Northbrook, Illinois 60062.
- The owner of the property located at 3501 South Pulaski, Chicago, Illinois during the time period of July 10, 2019 to present is HRP Exchange 55, LLC. The address of HRP Exchange 55, LLC is 111 South Wacker Drive, Suite 3000, Chicago, Illinois 60606.

Contributing Sources: Nicholas Pullara; John Tschantz; Warranty Deeds, as identified in Attachment A.

15. Provide the name and current address of the operator(s) of the facility, during the time period of January 1, 2019, to the present.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects to this request in that it asks Respondent to make a legal conclusion as to whether any person or entity was an “operator.” Subject to and without waiving its objections, Respondent refers EPA to its prior answers to Requests 10 and 13.

Contributing Sources: Nicholas Pullara; Jeremy Grey.

16. If HRE Crawford LLC, Hilco Redevelopment, and Hilco Global were corporations during the time period of January 1, 2019, to the present, provide copies of the Articles of Incorporation.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent also specifically identifies certain documentation provided in response to this Request 16 as **Business Confidential Information** pursuant to 40 CFR § 2.203(b). Subject to and without waiving its objections, Respondent states that HRE Crawford, LLC and Hilco Redevelopment, LLC, respectively, have been Limited Liability Companies at all times during the period specified. “Hilco Global” is a trade name registered in the State of Delaware and is used for marketing purposes by Hilco Trading. As a marketing name, “Hilco Global” is not a corporation. Hilco Trading has been a Limited Liability Company at all times during the period specified.

Contributing Sources: Michael Bauer; Anne Garr; Eric Kaup; Each of the following as identified in Attachment A: HRP Crawford, LLC Certificate of Formation; HRP Crawford, LLC Name Change Certificate; Hilco Redevelopment, LLC Certificate of Formation; Hilco Trading, LLC Certificate of Formation; Hilco Global DBA Registration; Limited Liability Company Agreements for each Hilco Entity, as identified in Attachment A.

17. If HRE Crawford LLC, Hilco Redevelopment, and Hilco Global were subsidiaries of a corporation(s) during the time period of January 1, 2019, to the present, identify the parent corporation(s) and provide copies of pertinent documents supporting the subsidiary relationship(s).

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects to the request as overbroad, unduly burdensome, vague and ambiguous, as “pertinent documents” does not clearly identify the materials requested. Subject to and without waiving its objections, Respondent refers EPA to its prior response to Request 16.

Respondent identifies the information in the preceding sentence as **Business Confidential Information** pursuant to 40 CFR § 2.203(b).

Contributing Sources: Michael Bauer; Anne Garr; Eric Kaup.

18. If HRE Crawford LLC, Hilco Redevelopment, and Hilco Global were divisions of a corporation(s) during the time period of January 1, 2019 to the present, identify the corporation(s) and provide copies of pertinent documents supporting the claim that this company is a corporate division.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects to the request as overbroad, unduly burdensome, vague and ambiguous, as the term “divisions of a corporation(s)” is not clearly defined, and “pertinent documents” does not clearly identify the materials requested. Subject to and without waiving its objections, Respondent states that HRE Crawford, Hilco Redevelopment, and Hilco Global were not divisions of a corporation from January 1, 2019 to November 9, 2020, and refers EPA to its prior response to Request 16.

Contributing Sources: Michael Bauer; Anne Garr; Eric Kaup.

19. If HRE Crawford LLC, Hilco Redevelopment, and Hilco Global were partnerships during the time period of January 1, 2019 to the present, provide copies of the partnership agreements.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent objects to the request as vague and ambiguous in that the request does not define “partnership” or “partnership agreement.” Subject to and without waiving its objections, Respondent states the Hilco Entities are considered partnerships for tax purposes, and refers EPA to its prior response to Request 16.

Contributing Sources: Michael Bauer; Anne Garr; Eric Kaup.

20. If HRE Crawford LLC, Hilco Redevelopment, and Hilco Global were trusts during the time period of January 1, 2019 to the present, provide all relevant agreements and documents to support this claim.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent objects to the request as vague and ambiguous in that “all relevant agreements and documents” does not clearly identify the materials requested. Subject to and without waiving its objections, Respondent states that HRE Crawford, LLC, Hilco Redevelopment, LLC and Hilco Global were not trusts during the time period of January 1, 2019 to November 9, 2020. Respondent further refers EPA to its prior response to Request 16.

Contributing Sources: Michael Bauer; Anne Garr; Eric Kaup.

21. Provide a diagram of the facility in relation to each of the facility’s boundaries, north, east, south, west, and identify the distance between the point of the release and each facility boundary.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent also objects to the request as vague and ambiguous with respect to the terms “diagram,” “facility,” and “point of release.” Respondent further objects to any inference, implication or conclusion that any “release” has occurred at the Facility. Subject to and without waiving its objections, Respondent refers EPA to the Concrete Stack Exhibit, identified in Attachment A. Additional diagrams and figures of the Facility are contained in the Illinois SRP Documents identified in Attachment A.

Contributing Sources: Nicholas Pullara; Concrete Stack Exhibit; Illinois SRP Documents.

22. Provide a description of the area including residential, commercial, and industrial nature of the area surrounding the facility including the approximate distance of your closest neighbor in each direction.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects to the request as vague and ambiguous with respect to the terms “residential,” “commercial,” “industrial,” and “closest neighbor.” Respondent further objects to the request to the extent it requires Respondent to create information and complete calculations for approximate distances not already in existence or in its possession, custody, or control. Subject to and without waiving its objections, Respondent refers EPA to the Illinois SRP Documents identified in Attachment A, including the site information contained in the Phase I Environmental Site Assessment Report, performed by V3 Companies, dated November 29, 2017, and the aerial photographs contained therein.

Contributing Sources: Nicholas Pullara; Illinois SRP Documents; Phase I Environmental Site Assessment by V3 Companies dated November 29, 2017; Concrete Stack Exhibit.

23. At the time of acquisition of the facility, did you know or have reason to know of the disposal of any hazardous substances at the facility? Describe any investigation you undertook prior to acquiring the facility and the results of that investigation.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent specifically objects to the request to the extent it calls for a legal conclusion as to whether “disposal” of “hazardous substances” occurred. Respondent further objects to the request as vague, ambiguous, and overbroad, in that it contains no temporal frame of reference. Subject to and without waiving its objections, Respondent states that the current owner of the Crawford Facility, and the owner at the time of the stack implosion conducted April 11, 2020, is HRP Exchange. HRE Crawford is the former owner of the Crawford Facility that initially took title to the Facility on December 29, 2017. While HRE Crawford still exists and has not been legally dissolved, the entity currently has no assets or employees or ownership in, or control over the Crawford Facility. Ownership of the

Facility was transferred from HRE Crawford to HRP Exchange on July 10, 2019. Respondent further states that at the time of initial acquisition by HRE Crawford, environmental due diligence, including a Phase I Environmental Site Assessment performed by V3 Companies, dated November 29, 2017, identified in Attachment A, was conducted under the All Appropriate Inquiries regulations found at 40 CFR § 312.20 in order to qualify HRE Crawford as a Bona Fide Prospective Purchaser, as that term is defined under CERCLA. HRE Crawford's due diligence included review of environmental diligence materials from the seller. Respondent refers EPA to the NRG Documents identified in Attachment A, which contain the environmental documents provided to HRE Crawford by seller as part of acquisition due diligence, in addition to the V3 Companies Phase I Environmental Site Assessment, dated November 4, 2019, as identified in Attachment A, performed in connection with the acquisition of the Facility by HRP Exchange.

Contributing Sources: John Tschantz; NRG Documents; V3 Phase I Environmental Site Assessment, dated November 29, 2017; V3 Phase I Environmental Site Assessment, dated November 4, 2019.

24. To your knowledge, has there ever been a Site Assessment or other environmental analysis completed at the facility? If so, provide copies.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent specifically objects to the request as vague and ambiguous with respect to the terms "Site Assessment" and "environmental analysis," and overbroad in that the request contains no temporal frame of reference. Respondent also specifically identifies certain documentation provided in response to this Request 24 as **Business Confidential Information** pursuant to 40 CFR § 2.203(b). Subject to and without waiving its objections, Respondent refers EPA to its prior response to Request 23.

Respondent further states that, in December 2017, HRE Crawford engaged 39 North, LLC ("**39 North**") through the Agreement for the Transfer of Certain Environmental Liabilities ("**ATCEL**"), as identified in Attachment A, to act as an environmental coordinator and project manager for voluntarily obtaining environmental regulatory closure of the Crawford Facility. Pursuant to the ATCEL, 39 North, through its environmental consultant, V3 Companies ("**V3**"), voluntarily enrolled the Facility in the Illinois Site Remediation Program ("**SRP**") for the purpose of obtaining a comprehensive NFR letter. Before entering the program, from November 2017 to June 2018, V3 compiled historical information and performed investigations at the Facility. The results of V3's investigations have been compiled in the Illinois SRP Documents identified in Attachment A. These documents include the Comprehensive Site Investigation Report, dated July 2018, prepared by V3, and the Supplement to Comprehensive Site Investigation Report, Remediation Objectives Report & Remedial Action Plan, dated April 2019, prepared by V3, each of which reports have been conditionally approved by the Illinois Environmental Protection Agency ("**IEPA**").

V3 is currently preparing an Interim Remedial Action Completion Report summarizing the activities which have been completed in compliance with the approved Remediation Objectives Report & Remedial Action Plan. Active remediation activities of known conditions are complete and HRE Exchange's contractors are currently installing the engineered barriers that will be utilized to support the final comprehensive NFR letter. Respondent currently anticipates that the installation of engineered barriers will be complete by approximately the summer of 2021, at which time V3 will prepare and submit to the IEPA a Final Remedial Action Completion Report for the entire Facility. Respondent's goal is to receive the comprehensive NFR letter from the IEPA by the end of 2021.

Contributing Sources: Nicholas Pullara; John Tschantz; Ryan Hartley; Illinois SRP Documents.

25. Identify all known prior owners of the facility or property. For each owner, provide details regarding dates of ownership, evidence showing control of access to the facility, and any evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at the facility during time of ownership.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects to the request as vague, overbroad and unduly burdensome, including with respect to the phrase "control of access" and because it has no temporal frame of reference. Respondent also objects to any inference, implication or conclusion that any "hazardous substance," "pollutant" or "contaminant" was "released" or "threatened to be released" at the Facility. Respondent also objects to the request to the extent it seeks information that is not currently in existence and in Respondent's possession, custody, or control.

Subject to and without waiving its objections, Respondent refers EPA to its prior responses to Requests 14 and 23. Respondent also refers EPA to the following documents identified in Attachment A: NRG Documents; the Illinois SRP Documents, including the Phase I Environmental Site Assessment Report, performed by V3 Companies, dated November 29, 2017, and the historical information contained therein; and the Title Search Record.

Contributing Sources: NRG Documents; Illinois SRP Documents; the Phase I Environmental Site Assessment Report, performed by V3 Companies, dated November 29, 2017; and the Title Search Record.

26. Identify all known prior operators of the facility or any facilities previously operated at the property. For each operator, provide details regarding dates of operation, nature of prior operations, all evidence of control of facility access, and any evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the facility and/or its solid waste units during the time period they were operating the facility.

ANSWER: Respondent incorporates here and by reference its General Objections. Respondent also objects to the request as vague, overbroad and unduly burdensome, including as it contains no temporal frame of reference. Respondent further objects to the request to the extent that it asks Respondent to make legal conclusions about whether any entities are “operators.” Respondent also objects to any inference, implication, or conclusion that any “hazardous substance,” “pollutant” or “contaminant” was “released” or “threatened to be released” at the Facility.

Subject to and without waiving its objections, Respondent refers EPA to its prior response to Request 25.

Contributing Sources: NRG Documents; Illinois SRP Documents; the Phase I Environmental Site Assessment Report, performed by V3 Companies, dated November 29, 2017; and the Title Search Record.

27. Has any cleanup work been done at the facility, including but not limited to soil sampling or hazardous waste removal, whether or not under a regulatory or statutory requirement or voluntary program? If yes, please explain the following:

- a. What work has been done and on what dates?
- b. Was the work done under the direction or pursuant to a regulatory body or program (e.g., EPA CERCLA, RCRA, or state program)? If so, explain the applicable program, regulatory body, or regulation or statute.
- c. Provide any information on the presence of chemicals, hazardous substances, pollutants, contaminants, or waste that was produced from this cleanup, including sampling or other testing results.

ANSWER: Respondent incorporates here and by reference its General Objections. Respondent further objects to this request as overbroad and unduly burdensome, including as it contains no temporal frame of reference. Respondent also objects to this request in that it uses terms that are vague and ambiguous such as “cleanup work,” “soil sampling,” “hazardous waste removal,” “regulatory or statutory requirement,” and “voluntary program.” Subject to and without waiving its objections, Respondent refers EPA to its prior response to Request 24. Respondent further responds as follows with respect to work which has been performed since HRE Crawford acquired ownership of the Facility on December 29, 2017:

a) The Facility is enrolled in the Illinois SRP for the purposes of obtaining a comprehensive NFR letter from the Illinois EPA. Respondent refers EPA to the Illinois SRP Documents identified in Attachment A. Further sampling of materials has been conducted as part of handling, transporting, recycling, and disposing of materials associated with demolition and redevelopment activities at the Facility. Sampling Documents are identified in Attachment A.

b) See Response to Request 27(a) above.

c) See Response to Request 27(a) above.

Contributing Sources: Nicholas Pullara; Ryan Hartley; Jeremy Grey; Illinois SRP Documents; Sampling Documents.

28. Did you ever use, purchase, generate, store, treat, dispose, or otherwise handle at the facility any hazardous substances? If the answer to the preceding question is anything but an unqualified “no,” identify:

- a. in general terms, the nature and quantity of the hazardous substances so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
- b. the chemical composition, characteristics, physical state (e.g., solid, liquid) of each hazardous substance so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled;
- c. the persons who supplied you with each such hazardous substance;
- d. how each such hazardous substance was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;
- e. when each such hazardous substance was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;
- f. where each such hazardous substance was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and
- g. the quantity of each such hazardous substance used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.

ANSWER: Respondent incorporates here and by reference its General Objections. Respondent further objects to this request as overbroad and unduly burdensome. Respondent also objects to the request because it uses terms that are vague and ambiguous such as “purchase,” “chemical composition,” “characteristics,” “physical state,” “hazardous substance,” “used,” “purchased,” “generated,” “stored,” “treated,” “transported,” disposed,” or “otherwise handled.” Respondent further objects in that the request seeks information outside of Respondent’s possession, custody, or control. Subject to and without waiving its objections, Respondent refers EPA to its prior response to Request 27.

Contributing Sources: Nicholas Pullara; Ryan Hartley.

29. Provide all reports, information or data related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about the facility or property. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects to this request as vague, overbroad and unduly burdensome, as it includes no temporal frame of reference. Respondent also

specifically identifies certain documentation provided in response to this Request 29 as **Business Confidential Information** pursuant to 40 CFR § 2.203(b). Subject to and without waiving its objections, Respondent refers EPA to its prior response to Request 24, as well as to the [REDACTED]

Respondent further states that promptly after April 11, 2020, the City of Chicago's Department of Public Health and the EPA performed monitoring, sampling, and testing of environmental media at and in the vicinity of the Facility. The City of Chicago maintains a webpage that contains the results from its activities at the following web address:

<https://www.chicago.gov/city/en/sites/hilco/home/community-information.html>

The EPA maintains a webpage that contains the results from its activities at the following web address:

https://response.epa.gov/site/site_profile.aspx?site_id=14763.

The City of Chicago summarized the air quality monitoring results, in part, as follows: "US EPA dust sensors' readings in the days following the implosion did not show sustained exceedances of the Agency's health-based national air quality standards. More specifically, the Illinois ambient network (i.e., the air monitoring network maintained by the Illinois EPA) and the US EPA trackers indicate that there were no PM NAAQS (National Ambient Air Quality Standard) violations during or since the event." It summarized the settled dust sampling and testing results, in part, as follows: "No asbestos was detected in dust samples taken in the vicinity of the dust cloud. . . . Small concentrations of metals (lead and barium) were found in dust samples taken in the vicinity of the dust cloud, at levels that pose little health risk to residents."

After the April 11, 2020 implosion event, the following data and information was collected at the Facility on behalf of HRP Exchange, each as identified in Attachment A:

- Asbestos-Containing Materials Survey, dated April 16, 2020 by Weaver Consultants Group;

- [REDACTED]

- [REDACTED]

Contributing Sources: Nicholas Pullara; David Kedrowski; Mike Maxwell; Pablo Sanchez-Soria; Sampling Documents; Illinois SRP Documents; NRG Documents.

30. Describe the acts or omissions of any persons other than your employees, agents or those persons with whom you had a contractual relationship, that may have caused the release or threat of release of hazardous substances at the facility or property and damages relating therefrom and identify such persons. In addition:

- a. describe all precautions that you took against foreseeable acts or omissions of any such third parties and the consequences that could foreseeably result from such acts or omissions; and
- b. describe the care you exercised with respect to the hazardous substances found at the facility or property.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent specifically objects to any inference, implication, or conclusion that a “release” or “threat of release” of hazardous substances occurred at the Facility and that damages have resulted therefrom. Respondent further objects that this request uses terms that are vague and ambiguous, including “all precautions,” “foreseeable acts or omissions,” “consequences,” “foreseeably result,” “acts or omissions,” and “the care you exercised,” and that the request provides no temporal frame of reference. Respondent also objects to the request to the extent that it requires Respondent to make legal conclusions and to create information or documents not already existing and in Respondent’s possession, custody, or control. Respondent also specifically identifies the information in the following paragraph provided in response to this Request 30 as **Business Confidential Information** pursuant to 40 CFR § 2.203(b).



Respondent also refers EPA to the following documents, each as identified in Attachment A:

- **April 13, 2020 Letter to Samir Mayekar, Deputy Mayor of the City of Chicago;**
- **April 15, 2020 Letter to Hilco from Mayor Lightfoot of the City of Chicago;**
- **April 16, 2020 Letter to Mayor Lightfoot of the City of Chicago;**
- **April 15, 2020 Letter from HRP to IEPA;**
- **April 16, 2020 Letter from HRP to IEPA;**
- **Hilco Supplemental Measures Announcement;**
- **CDPH Implosion Inspection Reports for each of: Hilco Redevelopment Partners, HRP Exchange; MCM; and CDI.**
- **Exclusion Zone Diagram;**
- **IDOT Letter of Authority;**
- **Demolition Permit;¹**
- **CDOT Helicopter Lift Permit;**
- **Little Village Demolition Notice;**
- **Implosion Sequence of Events;**
- **Illinois SRP Documents;**
- **Fugitive Dust Control Plan; and**
- **Stack Reduction Analysis.**

Contributing Sources: Nicholas Pullara; Above-listed documents, each as identified in Attachment A.

31. Identify all past and present solid waste management units (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on the facility. For each such solid waste management unit, provide the following information:

- a. a map showing the unit's boundaries and the location of all known solid waste management units whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units;
- b. the type of unit (e.g., storage area, landfill, waste pile, etc.) and the dimensions of the unit;
- c. the dates that the unit was in use;
- d. the purpose and past usage (e.g., storage, spill containment, etc.);

¹ Respondent notes that the issuing authority, the City of Chicago Department of Buildings, erroneously identified the stack demolition on Heneghan Wrecking & Excavating Company, Inc.'s permit as opposed to MCM's permit.

- e. the quantity and types of materials (hazardous substances and any other chemicals) located in each unit;
- f. the construction (materials, composition), volume, size, dates of cleaning, and condition of each unit; and
- g. if unit is no longer in use, how was such unit closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent also objects to this request as overbroad and unduly burdensome, including in that it does not contain any temporal frame of reference. Respondent also objects to the request to the extent it requires Respondent to develop information not already existing or that is outside of Respondent's possession, custody, or control. Respondent also objects to this request as vague and ambiguous in its use of terms including "waste piles," "landfills," "waste ponds," "pits," and "container storage areas." Subject to and without waiving its objections, Respondent refers EPA to the NRG Documents and the Illinois SRP Documents identified in Attachment A.

Contributing Sources: Ryan Hartley; Nicholas Pullara; NRG Documents; Illinois SRP Documents.

32. Has any contaminated soil ever been excavated or removed from the facility or property? Unless the answer to the preceding question is anything besides an unequivocal "no," identify:

- a. amount of soil excavated;
- b. location of excavation;
- c. manner and place of disposal and/or storage of excavated soil;
- d. dates of soil excavation;
- e. identity of persons who excavated or removed the soil;
- f. reason for soil excavation;
- g. whether the excavation or removed soil contained hazardous substances and why the soil contained such substances;
- h. all analyses or tests and results of analyses of the soil that was removed from the facility or property; and
- i. all persons, including contractors, with information about (a) through (h) of this request.

ANSWER: Respondent incorporates here and by references its General Objections. Respondent further objects to this request as overbroad and unduly burdensome, including in that it contains no temporal frame of reference. Respondent also objects to the request to the extent it requires Respondent to develop information not already in existence or within Respondent's possession, custody, or control. Respondent also objects to this request in that it uses terms that are vague and ambiguous, such as "contaminated," "location," "manner," "place of disposal," "excavated soil," and "removed." Subject to and without waiving its objections, Respondent refers EPA to the NRG Documents and the Illinois SRP Documents, each as identified in Attachment A. Further, sampling of materials associated with demolition and redevelopment activities at the Facility has been conducted. Sampling Documents are also identified in Attachment A. Respondent also responds as follows:

The Facility is currently voluntarily enrolled in the Illinois SRP, with the goal of obtaining a NFR letter from the IEPA by the end of 2021. As part of the SRP activities, the Supplement To Comprehensive Site Investigation Report, Remediation Objectives Report & Remedial Action Plan, as identified within the Illinois SRP Documents in Attachment A, was submitted to the IEPA in April 2019. The report, and subsequent comment letters, were conditionally approved by the IEPA in its September 20, 2019 letter, as identified within the Illinois SRP Documents in Attachment A. In accordance with the IEPA-approved Remedial Action Plan ("RAP"), identified within the Illinois SRP Documents in Attachment A, remediation activities have commenced and continue as of the time of this Response. The locations and rationale of the remediation areas are documented in the IEPA-approved RAP with the addition of one area known as the Former AST Piping Area. This Area was identified during the active remediation activities. The details and location of the Former AST Piping Area will be provided to the IEPA as part of the Interim Remedial Action Completion Report ("RACR") to be submitted once remediation activities are complete.

To date, approximately 4,030 cubic yards ("cy") of soil have been excavated under the SRP activities. The soils were excavated at various time periods, including, November 2019, July 2020 and September through November 2020. Approximately 2,190 cy of the excavated soil is being managed onsite in accordance with the IEPA-approved RAP. The remaining approximately 1,840 cy of excavated soil was disposed offsite as non-special, non-hazardous waste at the Waste Management Laraway Landfill facility in Joliet, Illinois. Excavation activities were performed by O6Env and RW Collins.

To the best of Respondent's knowledge, no soil excavated or removed contained hazardous substances.

Contributing Sources: Nick Pullara; Ryan Hartley; NRG Documents; Illinois SRP Documents; Sampling Documents.

Questions about April 11, 2020

33. Describe in detail the chain of events that produced the release on April 11, 2020, including the demolition of the stack.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects that this request is overbroad, unduly burdensome, and the scope of materials sought is not relevant for the scope of information EPA is authorized to pursue as provided in 42 U.S.C. § 9604(e)(2). Respondent further objects on the basis that the request is vague and ambiguous, including the terms “in detail,” and “chain of events.” Respondent also objects to any inference, implication or conclusion that any “release” occurred at the Facility on April 11, 2020, and also to the extent the request requires Respondent to make a legal conclusion about whether a “release” occurred on April 11, 2020. Subject to and without waiving its objections, Respondent refers EPA to its prior response to Request 30.

Contributing Sources: Nicholas Pullara.

34. Identify each hazardous substance released and its Chemical Abstract Service (CAS) number.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects that this request is overbroad and unduly burdensome, as the request does not contain any temporal frame of reference. Respondent also objects to any inference, implication or conclusion that any “release” occurred at the Facility, and also to the extent the request requires Respondent to make a legal conclusion about whether a “release” occurred. Subject to and without waiving its objections, Respondent states that it does not have information to indicate that any hazardous substance was released as a result of the implosion event on April 11, 2020. Further, Respondent refers EPA to its prior response to Request 29.

Contributing Sources: See prior response to Request 29.

35. How much of each hazardous substance was released? Describe your method or source of information in calculating the quantity released and provide the calculations.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects that this request is overbroad and unduly burdensome, including because the request does not provide any temporal frame of reference. Respondent also objects to any inference, implication or conclusion that any “release” occurred at the Facility, and also to the extent the request requires Respondent to make a legal conclusion about whether a “release” occurred. Subject to and without waiving its objections, Respondent refers EPA to its prior response to Requests 29 and 34.

Contributing Sources: See prior responses to Requests 29 and 34.

36. Explain whether the following were present in the stack, surface soils in the stack implosion fall zone, and/or release and in what amount: asbestos, polychlorinated biphenyls (PCBs), barium, lead, mercury, and arsenic. Explain your analysis to determine whether such substances were present and your process for determining the amount released of each substance.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects that this request is overbroad and unduly burdensome, including because the request does not provide any temporal frame of reference. Respondent further objects that the request is vague and ambiguous, including with respect to the terms “surface soils” and “fall zone.” Respondent also objects to any inference, implication, or conclusion that any of the listed substances were released at or from the Facility at any time.

Subject to and without waiving its objections, Respondent refers EPA to its prior response to Request 29. Additionally, Respondent specifically refers EPA to the MTS Stack Test Results and Asbestos-Containing Materials Survey, dated April 16, 2020 by Weaver Consultants Group, identified in Attachment A.

Contributing Sources: See prior response to Request 29; MTS Stack Test Results; Asbestos-Containing Materials Survey, dated April 16, 2020 by Weaver Consultants Group.

37. Describe the surfaces on or to which each hazardous substance was released and how much was released to each surface. Describe your method or source of information in calculating the quantity and provide the calculations.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects that this request is overbroad and unduly burdensome, including because the request does not provide any temporal frame of reference. Respondent also objects to any implication, inference, or conclusion that a “release” occurred. Respondent further objects to the request to the extent that it requires Respondent to make a legal conclusion about whether a “release” occurred. Respondent also objects on the basis that the request is vague and ambiguous, including with respect to the term “surfaces.” Respondent also objects to the request to the extent that it calls for a legal conclusion that Respondent is or was required to perform the calculations described, and to the extent it requires Respondent to generate materials or information not already in existence and within Respondent’s possession, control, or custody. Subject to and without waiving its objections, Respondent refers EPA to its prior responses to Requests 29 and 34.

Contributing Sources: See prior responses to Requests 29 and 34.

38. How much of each hazardous substance was released or migrated onto and/or into the soil and/or the subsurface strata? Describe your method or source of information in calculating the quantity and provide the calculations.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent also objects to this request as overbroad and unduly burdensome, as it does not provide any temporal or geographical frame of reference. Respondent also objects to any implication, inference, or conclusion that a “release” occurred. Respondent also objects to the request in that it requires Respondent to make a legal conclusion as to whether a “release” occurred or whether any “hazardous substance” “migrated” onto or into the soil or subsurface strata. Respondent also objects to any implication, inference, or conclusion that Respondent is or was required to perform the calculations described. Respondent also objects to the request to the extent it requires Respondent to generate materials or information not already existing and within Respondent’s possession, control, or custody. Subject to and without waiving its objections, Respondent refers EPA to its prior responses to Requests 29 and 34.

Contributing Sources: See prior responses to Requests 29 and 34.

39. How much of each hazardous substance volatilized? Describe your method or source of information in calculating the quantity and provide the calculations.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects that this request is overbroad and unduly burdensome, as it does not provide a temporal or geographical frame of reference. Respondent also objects to any implication, inference, or conclusion that Respondent is or was required to perform the calculations described, and to the extent it requires Respondent to generate materials or information not already existing and within Respondent’s possession, control, or custody. Subject to and without waiving its objections, Respondent refers EPA to its prior responses to Requests 29 and 34 and further states that Respondent does not have information to indicate that any hazardous substance volatilized as a result of the implosion event on April 11.

Contributing Sources: See prior responses to Requests 29 and 34.

40. How much of each hazardous substance was discharged into the sanitary sewer system? If any, describe the pre-treatment conducted by the facility. Describe your method or source of information in calculating the quantity and provide the calculations.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects to this request as overbroad and unduly burdensome, including because it does not contain any temporal or geographical frame of reference. Respondent also objects to any implication, inference, or conclusion that a “discharge” of a “hazardous substance” occurred, and objects to the extent the request calls for a legal conclusion that a “discharge” of a “hazardous substance”

occurred. Respondent also object to any implication, inference, or conclusion that it is or was required to perform the calculations described, and to the extent the request requires Respondent to generate materials or information not already existing and within Respondent's possession, control, or custody. Subject to and without waiving its objections, Respondent refers EPA to its prior responses to Requests 29 and 34 and further states that it does not have information to indicate that any hazardous substance was discharged into the sewer system as a result of the implosion event on April 11, 2020.

Contributing Sources: See prior response to Request 29; April 13, 2020 Letter to Samir Mayekar, Deputy Mayor of the City of Chicago; April 16, 2020 Letter to Lori E. Lightfoot, Mayor of the City of Chicago.

41. How much of each hazardous substance was discharged into the storm sewer system? Describe your method or source of information in calculating the quantity and provide the calculations.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects to this request as overbroad and unduly burdensome, including because it does not contain any temporal or geographical frame of reference. Respondent also objects to any implication, inference, or conclusion that a "discharge" of a "hazardous substance" occurred, and objects to the extent the request calls for a legal conclusion that a "discharge" of a "hazardous substance" occurred. Respondent also object to any implication, inference, or conclusion that it is or was required to perform the calculations described, and to the extent the request requires Respondent to generate materials or information not already existing and within Respondent's possession, control, or custody. Subject to and without waiving its objections, Respondent refers EPA to its prior responses to Requests 29, 34, and 40.

Contributing Sources: See prior responses to Requests 29, 34, and 40.

42. Did the hazardous substance(s) react with any substance to cause a by-product? If so, explain and provide the calculations to show the reaction and quantity of each by-product released.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects that this request is vague and ambiguous, including with respect to the terms "react," "substance," "reaction," and "by-product." Respondent further objects to the request as overbroad and unduly burdensome, including because the request includes no temporal or geographical frame of reference. Respondent also objects to any implication, inference, or conclusion that any hazardous substance was released as a result of the implosion event on April 11, 2020. Respondent also objects to the request to the extent it requires Respondent to make a legal conclusion as to whether a reaction occurred. Respondent further objects to any implication, inference, or conclusion that Respondent is or was

required to perform the calculations described, and objects to the extent the request requires Respondent to generate materials or information not already existing and in its possession, custody, or control. Subject to and without waiving its objections, Respondent refers EPA to its responses to Requests 29 and 34.

Contributing Sources: See prior responses to Requests 29 and 34.

43. What was the concentration of each hazardous substance when released? Describe your method or source of information in determining the concentration.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects to this request as overbroad and unduly burdensome, including because it does not contain any temporal or geographical frame of reference. Respondent also objects to any implication, inference, or conclusion that a “release” of a “hazardous substance” occurred, and objects to the extent the request calls for a legal conclusion that a “release” of a “hazardous substance” occurred. Respondent also object to any implication, inference, or conclusion that it is or was required to perform the calculations described, and objects to the extent the request requires Respondent to generate materials or information not already existing and within Respondent’s possession, control, or custody. Subject to and without waiving its objections, Respondent refers EPA to its prior response to Requests 29 and 34.

Contributing Sources: See prior responses to Requests 29 and 34.

44. Provide copies of any and all relevant descriptions of each hazardous substance(s) released, i.e., Material Safety Data Sheet, Safety Data Sheet, Manifest, Analytical Data, etc.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects to this request as overbroad and unduly burdensome, including because it does not contain any temporal or geographical frame of reference. Respondent also objects to the request as vague and ambiguous, as the term “any and all relevant descriptions” does not clearly identify the information requested. Respondent also objects to any implication, inference, or conclusion that a “release” of a “hazardous substance” occurred, and objects to the request to the extent it calls for a legal conclusion that a “release” of a “hazardous substance” occurred. Respondent also object to the extent the request requires Respondent to generate materials or information not already existing and within Respondent’s possession, control, or custody. Subject to and without waiving its objections, Respondent refers EPA to its prior responses to Requests 29 and 34.

Contributing Sources: See prior responses to Requests 29 and 34.

45. Provide the RCRA hazardous waste identification number for each hazardous substance released, if one exists.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects that this request is overbroad and unduly burdensome, including because the request does not include a temporal or geographical frame of reference. Respondent also objects to any implication, inference, or conclusion that any hazardous substance or waste was released, and objects to the extent the request calls for a legal conclusion that a “release” of a “hazardous substance” occurred. Subject to and without waiving its objections, Respondent refers EPA to its prior responses to Requests 29 and 34.

Contributing Sources: See prior responses to Requests 29 and 34.

46. Provide the results of any and all analyses, including but not limited to results of any sampling or air monitoring or modeling that was conducted regarding this release.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects that this request is overbroad and unduly burdensome, including because the request does not include a temporal or geographical frame of reference. Respondent also objects to any implication, inference, or conclusion that any “release” occurred as a result of the implosion event on April 11, 2020, and objects to the request to the extent it requires Respondent to make a legal conclusion about whether a “release” occurred.

Subject to and without waiving its objections, Respondent refers EPA to its response to Request 29.

Contributing Sources: See prior response to Request 29.

47. Describe in detail the actions taken by your employees and/or anyone else regarding the emergency response to this release, including any and all chemicals used, the handling or clean-up of the substance, including transportation and destination.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects that this request is vague and overbroad, including with respect to the terms “emergency response,” “chemicals,” “clean-up,” and “substance.” Respondent also objects to any implication, inference, or conclusion that a “release” occurred as a result of the implosion event on April 11, 2020. Respondent also objects to the request to the extent it requires Respondent to make a legal conclusion about whether a release occurred. Subject to and without waiving its objections, Respondent refers EPA to its prior response to Request 29 and further states as follows:

Following the implosion event on April 11, 2020, Respondent took response actions to cleanup dust that may have been emitted beyond the Facility boundaries, as described in the following documents, each as identified in Attachment A:

- April 13, 2020 Letter to Samir Mayekar, Deputy Mayor of the City of Chicago;
- April 15, 2020 Letter to Hilco from Mayor Lightfoot of the City of Chicago;
- April 16, 2020 Letter to Mayor Lightfoot of the City of Chicago;
- April 15, 2020 Letter from HRP to IEPA;
- April 16, 2020 Letter from HRP to IEPA;
- Hilco Supplemental Measures Announcement.

Contributing Sources: Nicholas Pullara; Above-listed documents, each as identified in Attachment A.

48. Did any of the substance(s) released migrate beyond the facility’s boundaries? If so, explain.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects that this request is vague and ambiguous, including with respect to the term “substance(s),” and as the request fails to establish any temporal frame of reference. Respondent also objects to any implication, inference, or conclusion that a “release” occurred as a result of the implosion event on April 11, 2020. Respondent also objects to the request to the extent it requires Respondent to make a legal conclusion about whether a “release” occurred. Subject to and without waiving its objections, Respondent refers EPA to its prior responses to Request 29 and 47, and to the Implosion Video, as identified in Attachment A.

Contributing Sources: Nicholas Pullara; Implosion Video. See prior Responses to Requests 29 and 47.

49. Provide copies of any permits that cover this release and provide an explanation of why you believe this release is covered by this permit.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects to any implication, inference, or conclusion that any “release” occurred as a result of the implosion event on April 11, 2020. Respondent also objects to the extent the request requires Respondent to make a legal conclusion about whether a “release” occurred. Subject to and without waiving its objections, Respondent refers EPA to its prior responses to Requests 29, 30, and 34. Respondent has not otherwise identified any information responsive to this request.

Contributing Sources: See prior responses to Requests 29, 30, and 34.

50. To the best of your knowledge what was the duration of the release from onset to mitigation? Explain how you determined the onset and mitigation of the release and what documents or information you relied on to make your determination.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects that this request is vague and ambiguous, including with

respect to the terms “onset” and “mitigation.” Respondent further objects to any implication, inference, or conclusion that any “release” occurred as a result of the implosion event on April 11, 2020. Respondent also objects to the request to the extent it requires Respondent to make a legal conclusion about whether a “release” occurred. Subject to and without waiving its objections, Respondent refers EPA to its prior responses to Requests 29, 47, and 48.

Contributing Sources: See prior responses to Requests 29, 47, and 48.

51. Provide the weather conditions at the time of the release including the temperature, humidity, wind speed and direction, precipitation, sunny/cloudy, and barometric conditions.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects to any implication, inference, or conclusion that any “release” occurred as a result of the implosion event on April 11, 2020. Respondent also objects to the request to the extent it requires Respondent to make a legal conclusion about whether a “release” occurred. Respondent also objects to the request to the extent it requires Respondent to create or obtain information not currently in existence and within Respondent’s possession, custody, or control. Subject to and without waiving its objections, Respondent refers EPA to the Weather Report and the Implosion Video, each as identified in Attachment A.

Contributing Sources: Weather Report; Implosion Video.

52. Did the facility receive any concerned citizen inquiries regarding the incident on April 11, 2020? Please provide documentation, including who made it, the date and time of the inquiry, and any other information about the inquiry.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects that the request is vague and ambiguous, including with respect to the term “citizen inquiries.” Respondent also objects to the extent the request requires Respondent to generate or obtain information not already in existence and within Respondent’s possession, custody, or control. Subject to and without waiving its objections, Respondent refers EPA to the Call Log, identified in Attachment A.

Contributing Sources: Call Log.

53. Did the facility receive any concerned citizen complaints regarding the incident on April 11, 2020? Please provide documentation, including who made it, the date and time of the inquiry, and any other information about the complaint

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects that the request is vague and ambiguous, including with respect to the term “citizen complaints.” Respondent also objects to the extent the request requires Respondent to generate or obtain information not already in

existence and within Respondent's possession, custody, or control. Subject to and without waiving its objections, Respondent refers EPA to its prior response to Request 52.

Contributing Sources: See prior response to Request 52.

54. Were there any evacuations, persons medically treated, hospitalizations, and/or deaths associated with this release? If so, describe in detail.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects that the terms "evacuations" "medically treated" and "hospitalizations" are vague and ambiguous. Further, Respondent objects to the request as overbroad and unduly burdensome, in that it does not provide a temporal or geographical frame of reference. Respondent further objects to any implication, inference, or conclusion that any "release" occurred as a result of the implosion event on April 11, 2020. Respondent also objects to the request to the extent it requires Respondent to make a legal conclusion about whether a "release" occurred. Subject to and without waiving its objections, Respondent states that it has been served with complaints in two pending litigation matters, *Solis, et al. v. Hilco Redevelopment, LLC, et al.*, and *Ramirez-Mercado v. HRE Crawford, LLC, et al.*, and none of those plaintiffs have alleged that there were any evacuations, medical treatment, hospitalizations, or deaths as a result of the implosion event on April 11, 2020. Separate and apart from those complaints, Respondent is not aware of any evacuation, medical treatment, hospitalization, or death of any person as a result of the implosion event on April 11, 2020.

Contributing Sources: Nicholas Pullara; Jeremy Grey; and Roberto Perez.

55. Was there any known environmental damage, i.e., fish kills, vegetation damage? If so, describe in detail.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects that this request is vague and ambiguous, including with respect to the terms "environmental damage," "fish kills," and "vegetation damage." Respondent also objects that the request does not provide any temporal frame of reference. Subject to and without waiving its objections, Respondent states that it is not aware of any environmental damage associated with the implosion event on April 11, 2020.

Contributing Sources: Nicholas Pullara; Jeremy Grey; and Roberto Perez.

56. Provide both the date and time when you first realized that a hazardous substance was released from the facility on April 11, 2020.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects to any implication, inference, or conclusion that any

“release” occurred as a result of the implosion event on April 11, 2020. Respondent also objects to the request to the extent it requires Respondent to make a legal conclusion about whether a “release” occurred. Subject to and without waiving its objections, Respondent refers EPA to its prior responses to Requests 29, 34, and 48, and states further that it is unaware of any hazardous substance being released from the Facility on April 11, 2020.

Contributing Sources: See prior responses to Requests 29, 34, and 48.

57. Provide both the date and time when you had knowledge that a reportable quantity (RQ) of a hazardous substance was released from the facility on April 11, 2020.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects to any implication, inference, or conclusion that any “release” occurred as a result of the implosion event on April 11. Respondent also objects to the request to the extent it requires Respondent to make a legal conclusion about whether a “release” occurred. Subject to and without waiving its objections, Respondent refers EPA to its prior response to Request 56, and states further that it is unaware of any hazardous substance being released from the Facility on April 11, 2020 above a reportable quantity.

Contributing Sources: See prior response to Request 56.

58. If the time of knowledge of the release and time of knowledge of an RQ released is not the same, explain what actions your employees took in determining that an RQ was released.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects to any implication, inference, or conclusion that any release occurred as a result of the implosion event on April 11, 2020. Respondent also objects to the request to the extent it requires Respondent to make a legal conclusion about whether a “release” occurred. Subject to and without waiving its objections, Respondent refers EPA to its prior responses to Requests 56 and 57.

Contributing Sources: See prior responses to Requests 56 and 57.

59. Did HRE Crawford LLC, Hilco Redevelopment, or Hilco Global notify the National Response Center regarding the April 11, 2020, release? If so, provide the name of the individual that provided the notification, the agency notified, and the date and time of each call.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects to any implication, inference, or conclusion that any “release” occurred as a result of the implosion event on April 11. Respondent also objects to the request to the extent it requires Respondent to make a legal conclusion about whether a “release” occurred. Respondent also objects to any implication, inference, or conclusion that it was required by law to notify the National Response Center as described. Subject to and without waiving its objections, Respondent states that HRE Crawford, LLC, Hilco Redevelopment, LLC and Hilco Global did

not notify the National Response Center regarding the implosion event on April 11, 2020.

Contributing Sources: Nicholas Pullara.

60. Did HRE Crawford LLC, Hilco Redevelopment, or Hilco Global notify the Illinois State Emergency Response Commission regarding the April 11, 2020, release? If so, provide the name of the individual that provided the notification, the agency notified, and the date and time of each call.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects to any implication, inference, or conclusion that any “release” occurred as a result of the implosion event on April 11, 2020. Respondent also objects to the request to the extent it requires Respondent to make a legal conclusion about whether a “release” occurred. Respondent also objects to any implication, inference, or conclusion that it was required by law to notify the Illinois State Emergency Response Commission as describe. Subject to and without waiving its objections, Respondent states that HRE Crawford, LLC, Hilco Redevelopment, LLC and Hilco Global did not notify the Illinois State Emergency Response Commission regarding the implosion event on April 11, 2020.

Contributing Sources: Nicholas Pullara.

61. Did HRE Crawford LLC, Hilco Redevelopment, or Hilco Global notify the Cook County Emergency Planning Committee regarding the April 11, 2020, release? If so, provide the name of the individual that provided the notification, the agency notified, and the date and time of each call.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects to any implication, inference, or conclusion that any “release” occurred as a result of the implosion event on April 11, 2020. Respondent also objects to the request to the extent it requires Respondent to make a legal conclusion about whether a “release” occurred. Respondent also objects to any implication, inference, or conclusion that it was required by law to notify the Cook County Emergency Planning Committee as described. Subject to and without waiving its objections, Respondent states that HRE Crawford, LLC, Hilco Redevelopment, LLC and Hilco Global did not notify the Cook County Emergency Planning Committee regarding the implosion event on April 11, 2020.

Contributing Sources: Nicholas Pullara.

62. Did HRE Crawford LLC, Hilco Redevelopment, or Hilco Global notify the City of Chicago Local Emergency Planning Committee regarding the April 11, 2020, release? If so, provide the name of the individual that provided the notification, the agency notified, and the date and time of each call.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent further objects to any implication, inference, or conclusion that any “release” occurred as a result of the implosion event on April 11, 2020. Respondent also objects to the request to the extent it requires Respondent to make a legal conclusion about whether a “release” occurred. Respondent also objects to any implication, inference, or conclusion that it was required by law to notify the City of Chicago Local Emergency Planning Committee as described. Subject to and without waiving its objections, Respondent states that HRE Crawford, LLC, Hilco Redevelopment, LLC and Hilco Global did not notify the City of Chicago Local Emergency Planning Committee regarding the implosion event on April 11, 2020, but did contact the City of Chicago Fire Department which was present at the Facility at the time of the implosion event on April 11, 2020. Additionally, representatives from the City of Chicago Department of Buildings and City of Chicago Department of Public Health, as well as the Alderman of Little Village and certain of his staff members, were present at the Facility at the time of the implosion event and observed the event firsthand. Respondent refers EPA to the Implosion Attendance List, identified in Attachment A. Respondent was also in regular contact with the City of Chicago, Office of the Mayor, subsequent to the implosion event, as described in the following documents, each as identified in Attachment A:

- April 13, 2020 Letter to Samir Mayekar, Deputy Mayor of the City of Chicago;
- April 15, 2020 Letter to Hilco from Mayor Lightfoot of the City of Chicago; and
- April 16, 2020 Letter to Mayor Lightfoot of the City of Chicago.

Contributing Sources: Nicholas Pullara; Roberto Perez; Implosion Attendance List; Above-referenced Letters, as identified in Attachment A.

63. Did HRE Crawford LLC, Hilco Redevelopment, or Hilco Global provide a written follow-up emergency notice to the Illinois State Emergency Response Commission? If so, provide documentation to support your claim.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent also objects to the request as vague and ambiguous with respect to the term “follow-up emergency notice.” Respondent also objects to any implication, inference, or conclusion that it was required by law to provide emergency notice to the Illinois State Emergency Response Commission as described. Subject to and without waiving its objections, Respondent refers EPA to its prior response to Request 60, and states that HRE Crawford, LLC, Hilco Redevelopment, LLC and Hilco Global did not provide a written follow-up emergency notice to the Illinois State Emergency Planning Commission, but did contact the Illinois EPA following the implosion event on April 11, 2020, as described in the following documents, each as identified in Attachment A:

- April 15, 2020 Letter from HRP to IEPA;

- April 16, 2020 Letter from HRP to IEPA.

Contributing Sources: Nicholas Pullara; Above-referenced Letters, each as identified in Attachment A.

64. Did HRE Crawford LLC, Hilco Redevelopment, or Hilco Global provide a written follow-up emergency notice to the Cook County Local Emergency Planning Committee? If so, provide documentation to support your claim.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent also objects to the request as vague and ambiguous with respect to the term “follow-up emergency notice.” Respondent also objects to any implication, inference, or conclusion that it was required by law to provide notice to the Cook County Local Emergency Planning Committee as described. Subject to and without waiving its objections, Respondent refers EPA to its prior response to Request 61, and states that HRE Crawford LLC, Hilco Redevelopment, LLC and Hilco Global did not provide a written follow-up emergency notice to the Cook County Local Emergency Planning Committee.

Contributing Sources: Nicholas Pullara.

65. Did HRE Crawford LLC, Hilco Redevelopment, or Hilco Global provide a written follow-up emergency notice to the City of Chicago Local Emergency Planning Committee? If so, provide documentation to support your claim.

ANSWER: Respondent incorporates here by reference its General Objections. Respondent also objects to the request as vague and ambiguous with respect to the term “follow-up emergency notice.” Respondent also objects to any implication, inference, or conclusion that it was required by law to provide notice to the City of Chicago Local Emergency Planning Committee as described. Subject to and without waiving its objections, Respondent refers EPA to its prior response to Request 62, and states that HRE Crawford LLC, Hilco Redevelopment, LLC and Hilco Global did not provide a written follow-up emergency notice to the City of Chicago Local Emergency Planning Committee.

Contributing Sources: Nicholas Pullara.

Schedule of Disclosed Documents
Response to U.S. EPA Request for Information
Hilco Redevelopment, LLC; HRE Crawford, LLC; Hilco Global

[illegible]



General Documents

Weather Report	Weather Report_Weatherunderground.pdf
Implosion Video	2020.04.11 Implosion video.mov
Warranty Deed, Doc. No. 1919657097 recorded with Cook County Recorder	Special Warranty Deed 1.pdf
Warranty Deed, Doc. No. 1804615056 recorded with Cook County Recorder	Special Warranty Deed 2.pdf
Title Search Reccord	Title Search Record.pdf
CDPH Demolition Dust Fact Sheet	2020.04.13 CDPH Fact Sheet.pdf
CDPH Demolition Dust Fact Sheet (Spanish)	2020.04.13 CDPH Fact Sheet_Spanish.pdf
Little Village Demolition Notice	Little Village Demolition Notice.pdf
Implosion Sequence of Events	2020.04.11 Implosion Sequence of Events.pdf
April 13, 2020 Letter to Samir Mayekar, Deputy Mayor of the City of Chicago	2020.04.13 Hilco to Deputy Mayor of Chicago.pdf
April 15, 2020 Letter to Hilco from Mayor Lightfoot of the City of Chicago	2020.04.15 Mayor Lightfoot to Hilco.pdf
April 16, 2020 Letter to Lori E. Lightfoot, Mayor of the City of Chicago	2020.04.16 Hilco to Mayor Lightfoot.pdf
April 15, 2020 Letter from HRP to IEPA	2020.04.15 Letter from HRP to IEPA.pdf
April 16, 2020 Letter from HRP to IEPA	2020.04.16 Letter from HRP to IEPA.pdf
City Sample Results Press Release	2020-04-27 City Press Release Test Results.pdf
Hilco Supplemental Measures Announcement	2020.04.20 Supplemental Measures Announcement.pdf
Implosion Attendance List	2020.04.11 Implosion Attendance List.pdf
CDI Preliminary Plan & Procedure	2020.02.19 CDI Preliminary Plan & Procedure.pdf
Concrete Stack Exhibit	Map_Stack to Property Line Distances.pdf
Exclusion Zone Diagram	2020.02.19 CDI Exclusion Zone Diagram.pdf
CDPH Implosion Inspection Report for CDI	2020.04.11 City Inspection Report_CDI.pdf

CDPH Implosion Inspection Report for MCM	2020.04.11 City Inspection Report_MCM.pdf
CDPH Implosion Inspection Report for HRP	2020.04.11 City Inspection Report_HRP.pdf
CDPH Implosion Inspection Report HRP Exchange	2020.04.11 City Inspection Report_HRP Exchange.pdf
Call Log	April 2020 Call Log.pdf
HRP Crawford, LLC Name Change Certificate	HRE Crawford, LLC - DE certificate of amendment changing name from HRP.pdf
HRP Crawford, LLC Certificate of Formation	HRP Crawford - DE certificate of formation.pdf
Hilco Redevelopment, LLC Certificate of Formation	Hilco Redevelopment, LLC - DE certificate of formation.pdf
Hilco Trading, LLC Certificate of Formation	Hilco Trading LLC - DE - Certified Copy charter docs.pdf
Hilco Global DBA Registration	Hilco Global dba registration - New Castle County Delaware.pdf
Fugitive Dust Control Plan	CGP Fugitive Dust Control Plan.pdf
CDOT Helicopter Lift Permit	2020-04-06 DOT Helicopter Lift Permit Issued to MCM.pdf
Demolition Permit	2020-03-30 Heneghan Amended Wrecking, Demolition Permit.pdf
Stack Reduction Analysis	JEI-MTS CGP Stack Reduction.pdf
IDOT Letter of Authority	IDOT Letter of Authority.pdf

Sampling Documents

April 15, 2020 STAT Analytical Report, SUMMA Cannisters Dust Particles	Air - SUMMA Cannisters Dust Particles.pdf
April 15, 2020 STAT Analytical Report, SUMMA Cannisters Volatile Organic Compounds	Air - SUMMA Cannisters Volatile Organic Compounds.pdf
April 13, 2020 STAT Abbestos Analysis, Building Debris	Building Debris - Galbestos Sampling Asbestos Results.pdf
April 15, 2020 STAT Analytical Report for Building Debris	Building Debris - Galbestos Sampling PCBs Results.pdf
April 13, 2020 STAT Bulk Asbestos Analysis	Dust - Neighborhood Asbestos wipe samples.pdf
April 14, 2020 STAT Analytical Report, Wipe Samples	Dust - Neighborhood Metals wipe samples.pdf
April 16, 2020 Analytica Report, Preliminary Soil Samples	Preliminary Soil Samples Near Stack.pdf
April 14, 2020 V3 Smokestack Borings Figure	Smokestack Borings Figure.pdf

April 16, 2020 Asbestos Containing
Material Survey by Weaver
Consultants Group

2020.04.16 ACM Survey.pdf

V3 Soil Analytical Results (VOCs,
FOC, TPH)

Table 3.2.1_3.2.7 TACO TableSouth.pdf

April 27, 2020 CDPH Sampling
Results Statement

2020.04.27 City Sampling Statement.pdf

SUMMA Canisters Locations

SUMMA Canisters Locations.pdf

Dust Sampling Locations

Dust Sampling Locations.pdf

Dust Tracker Locations

Dust Tracker Locations.pdf

CDPH Community Air Quality
Information

2020.04.29 City of Chicago_Community Air Quality Information.pdf

CDPH Community Air Quality and
Asbestos Information

2020.04.23 City of Chicago_Community Air Quality, Asbestos
Information.pdf

MTS Stack Test Results

MTS Stack Test Results.pdf

Waste Manifests

HazChem Environmental
Corporation Uniform Waste
Manifests

2020.06_07 Hazchem Manifests.pdf

Heartland Recycling, L.L.C. Waste
Table

2020 summer_fall Heartland Waste.pdf

Lakeshore Recycling Systems
Waste Table

2020 spring_fall Lakeshore Waste.pdf

Lakeshore Recycling
Systems/Northstar Uniform Waste
Manifests

2020.05_07_09 Lakeshore_Northstar Manifests.pdf

NRG Documents

1956 Midwest Generation
Drawings

1956-Midwest Generation Dwgs (50 sheets).pdf

1998 Map and Well Construction
Details

1998 - (ENSR) Map and Well Construct Details.pdf

1998 Phase II Sampling Tables

1998 Phase II - (ENSR) - Tables 2-4.pdf

1998 ComEd Phase II ESA

1998 Phase II - (ENSR)_Crawford - 12.1988.pdf

1998 ComEd Phase II (no tables)

1998 Phase II (ENSR)_12.1998(no tables).pdf

1998 Document Abstracts

1999 Environmental Disclosure Document.pdf

2005 Pond Characterizations
Report

2005 Pond Characterizations_Crawford Section.pdf

2007 City of Chicago Little Village
Industrial Corridor Redevelopment
Plan and Project

2007 - Little Village Redevelopment Plan_2007.pdf

2008 People's Gas AOC for RIFS	2008.10.31 - PGL MGP Sites v-W-08-C-917 AOC RIFS
2010 Transformer Sampling Analytical Report	2010.03.10 PCB samples.pdf
2010 Document Abstracts	2010 - Sanitary District Resolutions.pdf
2011 Unit #7 Stack Internal and External Inspection Report	2011.06.01 Appendix D - Stack Inspection Reports.pdf
2012 Quarterly Groundwater Monitoring Results - Annual Report 2011	2011 - Crawford - 2011 Groundwater Annual Report
2011, Q1 Groundwater Monitoring Report	2011 - Crawford - 1Q2011 Groundwater Monitoring Report.pdf
2011, Q2 Groundwater Monitoring Report	2011 - Crawford - 2Q2011 Groundwater Monitoring Report.pdf
2011, Q3 Groundwater Monitoring Report	2011 - Crawford - 3Q2011 Groundwater Monitoring Report.pdf
2011 KPRG Draft Phase I Addendum Letter	2011 - KPRG - Draft Phase I Addendum Letter Crawford.pdf
2011 Hydrogeologic Assessment Report	2011 - Patrick Eng Hydrogeologic Assessment Report.pdf
2012 Midwest Generation, LLC Violation Notice Response	2012.07.27 Response to VN.pdf
2012, Q1 Groundwater Monitoring Report	2012 Quarterly Monitoring Results.pdf
2012 Midwest Generation, LLC Violation Notice Supplemental Response	2012.08.29 Supplemental Response to VN.pdf
2012 Midwest Generation, LLC Violation Notice	2012.06.11 Violation Notice.pdf
2012 Compliance Commitment Agreement	2012.10.24 IEPA Compliance Commitment Agreement.pdf
2012 City of Chicago Fisk and Crawford Reuse Task Force: Process, principles and recommendations	2012 - Final Report of Fisk & Crawford Reuse Task Force.pdf
2012 Hazardous Materials Assessment Report - Crawford Generating Station	2012.10 - Hazardous Material Assessment.pdf
2012 NPDES Permit Modification Request	2012.11.16 NPDES Modification Letter.pdf
2012 Final NPDES Permit	2012 - NPDES Permit.pdf
2013, Q1 Groundwater Monitoring Report	2013.04.25 First Quarter GW Results.pdf

2013 Illinois EPA Compliance Statement	2013.06.04 Compliance Statement.pdf
2013 ComEd aerial map	2013 - (Arcadis) ComEd aerial map.pdf
2013 Stormwater Pollution Prevention Plan	2013.12.02 Crawford Revised SWPPP
2013 Air Pollution Control Variance Petition	2013.04.04 - MWG CPS Variance Order.pdf
2015 site map aerial	2015 - (KPRG) site map aerial.pdf
2015 ComEd No Further Remediation Letter	2015 - ComEd NFR July 2015.pdf
2016 NRG/Midwest Generation, LLC Annual Stormwater Inspection Report	2015 - Crawford SWPP Inspection 2015
2015 Tier 1 Qualified SPCC Plan (Executed)	2015.03.10 - Crawford Tier 1 Qualified SPCC Plan
2015 ComEd Groundwater Ordinance Reliance Letter	2015.07.23 GW Ordinance - ComEd.pdf
2016 Midwest Generation Revised Phase I ESA	2015 - Phase I - (KPRG) with Appendices (Crawford).pdf
2016 City of Chicago Certificate of Operation, Midwest Generation	2016 - Crawford Chicago Cert of Operation.pdf
2016 Electrical Due Diligence, Executive Summary	2016 - Crawford Executive Summary.pdf
2016 Electrical Due Diligence Report	2016 - Crawford Technical Report.pdf
2016 Midwest Generation Revised Phase I ESA	2016 - Phase I - (KPRG) (no exhibits).pdf
2016 Advisory Memorandum, Illinois Advisory Committee to the US Commission on Civil Rights	2016 - SAC_AdvisoryMemo on effects (Crawford).pdf
2016 City of Chicago, EPCRA Tier 2 Webpage Screen Shot	2016 Crawford City of Chicago EPCRA Tier 2 Website Report.pdf
2017 Wetland/WOTUS Assessment	2017 - Crawford Wetland_Waters Assessment.pdf
2017 City of Chicago Certificate of Operation, Midwest Generation	2017 Chicago Cert of Operation Crawford.pdf
Crawford Site Summary	Site Plan Summary.pdf
ComEd Surface Soil Sampling Tables	ComEd Crawford Generating - surface soil sampling.pdf

Crawford_Transformer_PCB_Sampling_Information.pdf

crawford-polrep1 (EPA response to air emissions).pdf

crawford-polrep2 (EPA response to air emissions).pdf

Overview - Decommissioning.pdf

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